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17 **UNITED STATES DISTRICT COURT**  
18 **NORTHERN DISTRICT OF CALIFORNIA**  
19 **SAN FRANCISCO DIVISION**

20 AMERICAN FEDERATION OF  
21 GOVERNMENT EMPLOYEES, AFL-CIO, et  
22 al.,

Case No.: 3:25-cv-03070-JD

23 **DECLARATION OF KORY BLAKE**

24 Plaintiffs,

25 v.

26 DONALD J. TRUMP, in his official capacity as  
27 President of the United States, et al.,

28 Defendants.

## DECLARATION OF KORY BLAKE

I, Kory Blake, declare the following under penalties of perjury:

1. I am over 18 years of age and competent to give this declaration. This declaration is based on my personal knowledge, information, and belief.

2. I am the Area Field Services Director (“AFSD”) for the Eastern Region in the Organizing and Field Services department of the American Federation of State, County and Municipal Employees, AFL-CIO (“AFSCME”). As AFSD, I am responsible for providing guidance and leadership to the efforts of the International Union and affiliates in mobilizing the membership in support of the union’s programs. This includes coordinating and allocating AFSCME resources to affiliates within my assigned region, identifying AFSCME programs and services to meet the needs of affiliates, and engaging directly with council or local union leaders and members on organizing, contract and political campaigns. I am assigned to support AFSCME affiliates located in Washington, D.C., Maryland, and Virginia, including coordinating support and resources to AFSCME’s federal government employee affiliates and members. I have been an AFSD for AFSCME since 2020.

3. AFSCME is a national labor organization and unincorporated membership association headquartered at 1625 L Street N.W., Washington, D.C. 20036. AFSCME is the largest trade union of public employees in the United States, with around 1.4 million members organized into approximately 3,400 local unions, 58 councils and other affiliates, including retiree councils and chapters, in 46 states, including California, the District of Columbia, and Puerto Rico. AFSCME has approximately 185,000 members in the State of California. AFSCME, through its affiliate District Council 20 and its 18 constituent federal government local unions, as well as its affiliate United Nurses Associations of California/Union of Health Care Professionals (UNAC/UHCP), represents more than 6,000 federal civilian employees in agencies and departments across the federal government, including eight agencies and various subdivisions in the Executive Department and the Legislative Department.

1       4.     AFSCME organizes employees and advocates for fairness in the workplace, better  
2 wages and working conditions, excellence in public services, and prosperity and opportunity for  
3 all working families. AFSCME's core functions include providing support, guidance, and  
4 resources to our affiliates, some of which are the officially recognized exclusive representatives of  
5 federal employees in various bargaining units.

6       5.     Membership in AFSCME is voluntary.

7       6.     AFSCME's and its subordinate bodies' leadership is democratically elected by and  
8 from among its membership.

9       7.     AFSCME's activities and staff are funded through our members' voluntary dues,  
10 which are established by the AFSCME International Constitution and based on the percentage of  
11 hours worked for part-time or full-time members. These membership dues are paid via a direct,  
12 automatic deduction from the member's federal government paycheck, which goes to the  
13 AFSCME affiliate representing the member first, which then in turn remits a portion of those dues  
14 to AFSCME.

15       8.     AFSCME members include nurses, corrections officers, childcare providers,  
16 emergency medical technicians, sanitation workers, school bus drivers, civil engineers, policy  
17 analysts, and more. Its members working for the Executive Department of the federal government  
18 work to ensure aviation safety at the Department of Transportation's (DOT) Federal Aviation  
19 Administration (FAA), criminal justice through the Department of Justice (DOJ), food safety, rural  
20 development, and facilitation of international trade for U.S. farmers through the U.S. Department  
21 of Agriculture (USDA), civic engagement through service and volunteering through AmeriCorps  
22 and the Peace Corps, providing health care at the Jerry L. Pettis Memorial Veterans' Hospital (VA)  
23 and the Naval Medical Center San Diego (DOD), and providing objective news and information  
24 about the U.S. and the world to people who lack access to objective information at Voice of  
25 America (VOA).

26       9.     Unlike most of AFSCME's federal government employee members who are  
27 represented by AFSCME District Council 20 and its affiliated local unions, our members who  
28 Declaration of Kory Blake

1 work for the VA and DOD are represented by the United Nurses Association of California/United  
2 Health Care Professionals, AFSCME, AFL-CIO (UNAC/UHCP). UNAC/UHCP is a labor  
3 organization and an unincorporated association headquartered at 955 Overland Ct., Suite 150, San  
4 Dimas, California 91773. UNAC/UHCP represents employees of the VA who are employed at  
5 Pettis Memorial Hospital in Loma Linda, California, and employees of DOD who are employed  
6 at the Naval Medical Center San Diego. UNAC/UHCP is an affiliate union of AFSCME and its  
7 members are members of AFSCME.

8 **Harm to AFSCME, its Affiliates, and its Members**

9 10. The President's March 27, 2025, executive order ("EO") *Exclusions from Federal*  
10 *Labor-Management Relations Programs* is causing harm to AFSCME, its local councils and  
11 affiliates, and its members. The EO has upended collective bargaining protections for AFSCME's  
12 federal government employee members in certain Executive Department agencies or subdivisions.  
13 On its face, the executive order appears to exclude from collective bargaining around 2,700  
14 AFSCME represented employees who work for DOJ, VA, and DOD. A majority of AFSCME  
15 federal Executive Branch employee members work at agencies excluded under the EO. Others  
16 may be affected by the EO's delegated authority to the DOT to issue orders excluding any  
17 subdivision, including the FAA, from Federal Service Labor-Management Relations Statute  
18 (FSLMRS) coverage, or down the road later after other agencies submit reports about which of  
19 their employees should also be excluded from coverage within thirty days.

20 11. Neither AFSCME nor its affiliates received advance notice of the EO that appears  
21 to exclude many of its members. As such, AFSCME was not given a chance to rebut the EO's  
22 assertions that it is necessary to exclude union members from coverage of the FSLMRS based on  
23 "national security work."

24 12. The EO attempts to end fundamental collective bargaining rights for AFSCME  
25 members in those agencies and strips them of essential rights and protections that are secured by  
26 collective bargaining agreements with employer agencies. By eliminating these rights and  
27 protections from workers, the EO will undermine AFSCME's ability to perform its mission of

1 advocating for better working conditions for these federal employees. Numerous AFSCME local  
 2 unions, which are chartered on an individual bargaining unit basis, may cease to exist.

3       13. If the EO eliminates AFSCME's ability to collect dues through payroll deductions,  
 4 that will significantly reduce AFSCME's revenue and impair AFSCME's ability to organize,  
 5 advise, and advocate on behalf of its members and provide support to its affiliates.

6       14. The EO will also eliminate or reduce in size at least seven AFSCME bargaining  
 7 units. If a union cannot secure and defend a collective bargaining agreement on behalf of its  
 8 members, it has very little ability to attract members and advocate effectively for workers at a  
 9 given employer. By abolishing collective bargaining agreement and representational rights at  
 10 certain agencies, the EO has severely diminished AFSCME's ability to represent workers at those  
 11 agencies, and these local unions may cease to exist.

12       15. The EO is also negatively impacting members and affiliates in agencies not covered  
 13 (or not yet covered) by the EO, as well as AFSCME members at VA and DOD who could  
 14 potentially have their bargaining rights restored by the Secretary Veterans Affairs or Defense,  
 15 respectively. I understand that many of those members and affiliates are reluctant to publicly voice  
 16 views or opinions contrary to the Administration, because they worry that the Administration may  
 17 strip them of (or failure to restore them to) their collective bargaining rights if they do so.

18       16. In addition to the harms described above, the EO harms AFSCME, its affiliates,  
 19 and its members in ways specific to each agency, as described below. The injuries suffered by  
 20 AFSCME and its members are ongoing or imminent and will persist unless this Court intervenes.

21 **AFSCME Members at the Department of Justice**

22       17. AFSCME has five locals that represent bargaining units in different subdivisions  
 23 of the DOJ, an agency that is expressly covered by the EO without exception. The mission of the  
 24 DOJ is to uphold the rule of law, to keep our country safe, and to protect civil rights. AFSCME's  
 25 locals represent DOJ employees working in Office of Justice Programs, U.S. Parole Commission,  
 26 Justice Management Division, Office of Community Oriented Policing Services, and some of the  
 27 DOJ's Litigation Divisions. The EO strips these members working to uphold the rule of law—

1 domestically—of their collective bargaining rights under the FSLMRS.

2       18. AFSCME Local 2830 represents a collective bargaining unit of approximately 600  
3 DOJ, Office of Justice Programs (OJP) employees. Local 2830 represents all full-time and  
4 regularly scheduled part-time professional and non-professional OJP employees in Washington  
5 D.C. The OJP is the DOJ's largest grant making component, and bargaining unit employees work  
6 within various departments within the subdivision, including the Bureau of Justice Assistance,  
7 Bureau of Justice Statistics, Office of Administration, Office of the Assistant Attorney General,  
8 Office of Audit Assessment and Management, Office of the Chief Information Officer, Office of  
9 the Chief Financial Officer, Office of Civil Rights, Office of Communications, Office of Juvenile  
10 Justice and Delinquency Prevention, Office for Victims of Crime, National Institute of Justice, Sex  
11 Offender Sentencing, Monitoring, Apprehending, Registering, and Tracking Office. While OJP is  
12 a DOJ component, it does not engage in intelligence, counterintelligence, investigative, or national  
13 security work as its primary function. OJP's classification is Sensitive But Unclassified (SBU).

14       19. Many OJP bargaining unit employees who are Grants Management Specialists  
15 manage and support over \$15 billion in open criminal and juvenile justice-related science and  
16 statistics grant programs and contracts in some capacity. Managing grants and contracts involves  
17 monitoring awards programmatically and fiscally, as well as overseeing training and technical  
18 assistance for grantees. OJP's support functions include ensuring that grantees do not violate the  
19 civil rights of program recipients, providing Information Technology (IT) support for the Justice  
20 Grants and other systems, managing human resources, overseeing public affairs, including  
21 tracking legislation and responding to inquiries, and facilities management.

22       20. Other OJP bargaining unit employees include Accountants, Administrative  
23 Officers, Attorneys, Auditors, Senior Policy Advisors, Social and Physical Scientists, Social  
24 Science Research Analysts, Statisticians, Management and Program Analysts, Program  
25 Specialists, Public Affairs Specialists, Writer-Editors, Technology Advisors, Information  
26 Technology Specialists, and more. AFSCME Local 2830 represents the interests of the DOJ, OJP  
27 employees. The local's core functions include providing support, guidance, and resources to

1 bargaining unit employees as their officially recognized exclusive representative. As the exclusive  
2 representative for the nonsupervisory OJP employees, AFSCME Local 2830 enters into collective  
3 bargaining negotiations with the DOJ on a wide variety of terms and conditions of employment  
4 and represents bargaining unit members through the negotiated grievance process. AFSCME Local  
5 2830 and the OJP are parties to a collective bargaining agreement (“CBA”) that memorializes  
6 negotiated terms and conditions of employment, benefits, rules, a grievance procedure and other  
7 procedures of the workplace. This agreement has been effective since 2013 and automatically  
8 renews on an annual basis, unless party requests to bargain a new agreement. AFSCME Local  
9 2830 represents and advocates for bargaining unit members in resolving workplace disputes with  
10 the OJP through informal meetings, formal meetings, the negotiated grievance procedure up to and  
11 including arbitration.

12 21. AFSCME Local 2940 represents a collective bargaining unit of approximately 18  
13 DOJ, U.S. Parole Commission employees. The mission of the Parole Commission is to promote  
14 public safety and strive for justice and fairness in the exercise of its authority to release and revoke  
15 offenders under its jurisdiction. Local 2940 represents all non-professional and non-supervisory  
16 employees of the Parole Commission in Washington, D.C. Bargaining unit members are involved  
17 in the protecting the public safety.

18 22. These employees include Analysts and support staff. The Analyst recommends  
19 sanctions to be imposed for individuals on parole/supervised release to keep them compliant in the  
20 community. If the releasee continues to have non-compliance issues, Analyst ultimately  
21 recommend warrants to be issued to return them to federal custody or impose pre-release  
22 conditions to assist the releasees with a positive transition back into the community. In addition,  
23 Analysts review cases to determine if the releasee meets guideline requirements for possible early  
24 termination of their parole/ supervised release term. The support staff assist with locating  
25 witnesses, scheduling hearings, designation request to the Bureau of Prisons and issue Notice of  
26 Actions with the outcome of all hearings and actions ordered by a Parole Commissioner.

27 23. AFSCME Local 2940 represents the interests of the Parole Commission employees.

1 The local's core functions include providing support, guidance, and resources to bargaining unit  
2 employees as their officially recognized exclusive representative. As the exclusive representative  
3 for the nonsupervisory Parole Commission employees, AFSCME Local 2940 enters into collective  
4 bargaining negotiations with the DOJ on a wide variety of terms and conditions of employment  
5 and represents bargaining unit members through the negotiated grievance process. AFSCME Local  
6 2940 and the Parole Commission are parties to a collective bargaining agreement that  
7 memorializes negotiated terms and conditions of employment, benefits, rules, a grievance  
8 procedure and other procedures of the workplace. This agreement has been effective since 2018  
9 and automatically renews on an annual basis unless either party requests to bargain a new  
10 agreement. AFSCME Local 2940 represents and advocates for bargaining unit members in  
11 resolving workplace disputes with the Parole Commission through informal meetings, formal  
12 meetings, the negotiated grievance procedure, up to and including arbitration.

13 24. AFSCME Local 3097 represents a collective bargaining unit of approximately 9  
14 DOJ, Justice Management Division (JMD) employees. The mission of the JMD is to provide  
15 advice and counsel to senior management officials relating to all administrative functions of the  
16 Department. Local 3097 represents all JMD professional and non-professional employees in  
17 Washington, D.C.

18 25. AFSCME Local 3097 represents the interests of the JMD employees. The local's  
19 core functions include providing support, guidance, and resources to bargaining unit employees as  
20 their officially recognized exclusive representative. As the exclusive representative for the  
21 nonsupervisory JMD employees, AFSCME Local 3097 enters into collective bargaining  
22 negotiations with the DOJ on a wide variety of terms and conditions of employment and represents  
23 bargaining unit members through the negotiated grievance process. AFSCME Local 3097 and the  
24 JMD are parties to a collective bargaining agreement that memorializes negotiated terms and  
25 conditions of employment, benefits, rules, a grievance procedure and other procedures of the  
26 workplace. This agreement has been effective since 2012 and automatically renews on an annual  
27 basis, unless either party requests to bargain a new a agreement. AFSCME Local 3097 represents

1 and advocates for bargaining unit members in resolving workplace disputes with the JMD through  
2 informal meetings, formal meetings, the negotiated grievance procedure up to and including  
3 arbitration.

4 26. AFSCME Local 3187 represents a collective bargaining unit of approximately 56  
5 DOJ, Office of Community Oriented Policing Services (COPS) employees. COPS is the  
6 component of the DOJ responsible for advancing the practice of community policing by the  
7 nation's state, local, territorial, and tribal law enforcement agencies through information and grant  
8 resources. Bargaining unit members include Policy Analysts, Grant Management Specialists,  
9 Program Specialist, Accountants, Auditors, Social Science Analysts, Management and Program  
10 Analysts, Administrative Services Specialists, and IT Specialist. These employees develop and  
11 manage grant programs for law enforcement, including managing individual grants; monitoring  
12 and oversee grantees, including ensuring compliance with federal laws and regulations around  
13 spending of grant funds and to ensure no fraud occurs; managing the fiscal affairs of the agency,  
14 such as travel spending; and managing the IT infrastructure of the agency.

15 27. AFSCME Local 3187 represents the interests of the COPS employees. The local's  
16 core functions include providing support, guidance, and resources to bargaining unit employees as  
17 their officially recognized exclusive representative. As the exclusive representative for the  
18 nonsupervisory COPS employees, AFSCME Local 3187 enters into collective bargaining  
19 negotiations with the DOJ on a wide variety of terms and conditions of employment and represents  
20 bargaining unit members through the negotiated grievance process. AFSCME Local 3187 and the  
21 COPS are parties to a collective bargaining agreement that memorializes negotiated terms and  
22 conditions of employment, benefits, rules, a grievance procedure and other procedures of the  
23 workplace. AFSCME Local 3187 represents and advocates for bargaining unit members in  
24 resolving workplace disputes with the COPS through informal meetings, formal meetings, the  
25 negotiated grievance procedure up to and including arbitration.

26 28. AFSCME Local 3719 represents a collective bargaining unit of approximately 693  
27 DOJ, Office of Solicitor General, Litigating Division employees. The local represents Professional  
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1 Administrative Support Staff (PASS) employed by the Antitrust, Civil Rights, Civil, Environment  
2 and Natural Resources, and the Tax Litigating Divisions in Washington D.C. AFSCME Local  
3 3719 does not represent any employees in the DOJ's National Security Litigating Division. The  
4 local's bargaining unit members include Administrative Assistants, Legal Assistants, Legal  
5 Technicians, Civil Analyst, Paralegals, and Equal Opportunity Specialists. These employees  
6 provide litigation support to trial teams, investigations, testing of discriminatory practices,  
7 compliances, and all matters necessary for litigation.

8 29. AFSCME Local 3719 represents the interests of the Litigating Division employees.  
9 The local's core functions include providing support, guidance, and resources to bargaining unit  
10 employees as their officially recognized exclusive representative. As the exclusive representative  
11 for the nonsupervisory Litigating Division employees, AFSCME Local 3719 enters into collective  
12 bargaining negotiations with the DOJ's Litigating Divisions on a wide variety of terms and  
13 conditions of employment and represents bargaining unit members through the negotiated  
14 grievance process. AFSCME Local 3719 and the Litigating Divisions are parties to a collective  
15 bargaining agreement that memorializes negotiated terms and conditions of employment, benefits,  
16 rules, a grievance procedure and other procedures of the workplace. This agreement has been  
17 effective since 2002 and renews on an annual basis unless either party requests to bargain a new  
18 agreement. AFSCME Local 3719 represents and advocates for bargaining unit members in  
19 resolving workplace disputes with the Litigating Division through informal meetings, formal  
20 meetings, the negotiated grievance procedure up to and including arbitration.

21 30. If the DOJ employees lose their collective bargaining rights under the FSLMRS  
22 and AFSCME is no longer the exclusive representative of these employees, the Union cannot  
23 enforce the CBA in the workplace that facilitates labor-management relations and the union's  
24 mission of advocating for fairness in the workplace. AFSCME DOJ Locals' collective bargaining  
25 agreements set important terms and conditions of employment for employees. This includes  
26 establishing a negotiated grievance procedure to fairly resolve disputes between bargaining unit  
27 employees and management; setting terms and conditions for leave, hours of duty and overtime,

establishing health and safety standards; and providing commuter benefits for the use of public transportation, among many other workplace protections and benefits.

31. Without collective bargaining rights under the FSLMRS, AFSCME DOJ bargaining unit members will lose a labor-management relations framework they have been working under, and the union will no longer be able to fulfill its representational duties to the entire bargaining unit or enforce collective bargaining agreements.

32. If AFSCME is no longer the exclusive representative, it cannot represent all bargaining unit employees in resolving workplace disputes with the DOJ through informal meetings, formal meetings, or the negotiated grievance procedure up to and including arbitration. This will have a chilling effect on workers raising concerns over their terms and conditions of employment or about fairness in the workplace. This will lead to committed and talented federal government employees leaving the federal service because of declining terms and conditions of employment, and will impair the mission of the DOJ to provide its vital services to protect the rule of law.

## AFSCME Members at the Department of Transportation

33. AFSCME Local 1653 represents a bargaining unit of over 2000 non-supervisory civil servants who work for the FAA, a subordinate agency to the Department of Transportation. The FAA's mission is to provide the safest, most efficient aerospace system in the world. These employees include Aviation Safety Inspectors, Regulation Analysts, Accident Investigators, Economists, Computer Scientists, Regulation Attorneys, Enforcement Attorneys, Program Managers, Administrative Staff and Office Assistants, Operation Research Analysts, Policy Analysts, Technical Operations Specialists, Airport Inspectors, and others. Also in the bargaining unit are employees who work within the Air Traffic Organization and Aviation Safety departments at the FAA's headquarters. These bargaining unit members are highly technical policy experts who formulate FAA safety policy or provide analysis of safety data to recommend improvements to the nation aerospace operations.

34. AFSCME Local 1653 bargaining unit employees all report to the FAA

1 headquarters, but some employees' duty stations are in other states including California, New  
2 Jersey, Oklahoma, Washington, Georgia, and others.

3 35. AFSCME Local 1653 represents the interests of the FAA's non-supervisory civil  
4 servants. As the exclusive representative for the nonsupervisory FAA civil servants, AFSCME  
5 Local 1653 enters into collective bargaining negotiations with the FAA on a wide variety of terms  
6 and conditions of employment and represents bargaining unit members through the negotiated  
7 grievance process. AFSCME Local 1653 and the FAA are parties to a collective bargaining  
8 agreement that memorializes negotiated terms and conditions of employment, benefits, rules, a  
9 grievance procedure and other procedures of the workplace. The current agreement has a term of  
10 four years and expires on January 17, 2029.

11 36. I have spoken with members of AFSCME Local 1653, and although they are not  
12 yet definitively excluded from collective bargaining rights by the EO, they fear that they will be  
13 under Section 5 of the EO, and this has made them hesitant to speak out in public against the  
14 Administration for fear that it may increase the likelihood that they lose their collective bargaining  
15 rights as a result.

16 **AFSCME Members at the Department of Agriculture**

17 37. AFSCME has five locals that represent bargaining units in different subdivisions  
18 of the U.S. Department of Agriculture ("USDA"). These subdivisions include the USDA's Office  
19 of Operations, National Appeals Division, Rural Development, Farm Production and Conservation  
20 Business Center, Farm Service Agency, and Risk Management Agency, and the Foreign  
21 Agricultural Service. These subdivisions are not listed in Section 3 of the EO as having been  
22 already determined to have as a primary function intelligence, counterintelligence, investigative,  
23 or national security work. I have spoken with members of each of these locals, and although they  
24 are not yet definitively excluded from collective bargaining rights by the EO, they fear that they  
25 will be eventually after the USDA submits its report under Section 7 of the EO, and this has made  
26 them hesitant to speak out in public against the Administration for fear that it may increase the  
27 likelihood that they lose their collective bargaining rights as a result.

1       38. AFSCME Local 3976 represents the USDA's Foreign Agricultural Service  
2 ("FAS"), the foreign affairs arm of the USDA. Its primary mission is to open trade in other  
3 countries and assist farmers and producers in the United States to export their agricultural products  
4 abroad. In other words, FAS helps farmers and producers in the U.S. grow and thrive by opening  
5 foreign markets to American agricultural products.

6       39. AFSCME Local 3976 represents a bargaining unit of approximately 400 civil  
7 servants who work for the Foreign Agricultural Service in the Washington, D.C. metropolitan area.  
8 These employees include International Economists, International Trade Specialists, Nutritionists,  
9 Trade Policy Analysts, International Science Advisors, Technical Assistance Specialists,  
10 International Market Specialists, and others.

11       40. AFSCME Local 3976 represents the interests of the USDA's Foreign Agricultural  
12 Service nonsupervisory civil servants. Its core functions include providing support, guidance, and  
13 resources to bargaining unit employees as their officially recognized exclusive representative. As  
14 the exclusive representative for the nonsupervisory Foreign Agricultural Service civil servants,  
15 AFSCME Local 3976 enters into collective bargaining negotiations with the USDA on a wide  
16 variety of terms and conditions of employment and represents bargaining unit members through  
17 the negotiated grievance process. AFSCME Local 3976 and the USDA, Foreign Agricultural  
18 Service are parties to a collective bargaining agreement that memorializes negotiated terms and  
19 conditions of employment, benefits, rules, a grievance procedure and other procedures of the  
20 workplace. The current agreement has a term of five years and expires on January 8, 2030.

21       41. AFSCME Local 2846 represents a collective bargaining unit of approximately 112  
22 USDA, Office of Operations employees. The Office of Operations is an office within USDA's  
23 Departmental Administration that provides leadership, direction, and coordination, in activities at  
24 the USDA Headquarters and the George Washington Carver Center (GWCC). Local 2846  
25 represents all professional and non-professional employees employed by Office of Operations in  
26 the Washington, D.C. metropolitan area. The Local's members mainly include Mail Clerks who  
27 process incoming and outgoing mail, distribute delivered mail, and process certified mail.

1       42. AFSCME Local 2846 represents the interests of the USDA's Office of Operations  
2 employees. Its core functions include providing support, guidance, and resources to bargaining  
3 unit employees as their officially recognized exclusive representative. As the exclusive  
4 representative for the nonsupervisory employees, AFSCME Local 2846 enters into collective  
5 bargaining negotiations with the USDA on a wide variety of terms and conditions of employment  
6 and represents bargaining unit members through the negotiated grievance process. AFSCME Local  
7 2846 and the USDA, Office of Operations are parties to a collective bargaining agreement that  
8 memorializes negotiated terms and conditions of employment, benefits, rules, a grievance  
9 procedure and other procedures of the workplace. The agreement has been effective since 2010  
10 and rolls over on an annual basis, unless either party requests to bargain a new agreement.

11       43. AFSCME Local 3020 represents a collective bargaining unit of approximately 50  
12 USDA, Office of Hearing and Appeals (OHA) employees. The mission of the OHA is to plan,  
13 coordinate, and provide administrative support for the National Appeals Division (NAD), the  
14 Office of the Administrative Law Judges (OALJ), and the Office of the Judicial Officer (OJO).  
15 Local 3020 represents all professional and nonprofessional employees employed at OHA.  
16 AFSCME Local 3020 employees include Hearing Officers, Appeals Officers, Attorney Advisor  
17 OALJ, Legal Assistants, Administrative Support Assistants, Appeals Coordinators, Paralegal  
18 Specialists, IT Specialists, and Management Analysts.

19       44. AFSCME Local 3020 represents the interests of the USDA's OHA employees. Its  
20 core functions include providing support, guidance, and resources to bargaining unit employees as  
21 their officially recognized exclusive representative. As the exclusive representative for the  
22 nonsupervisory employees, AFSCME Local 3020 enters into collective bargaining negotiations  
23 with the USDA on a wide variety of terms and conditions of employment and represents bargaining  
24 unit members through the negotiated grievance process. AFSCME Local 3020 and the USDA,  
25 OHA are parties to a collective bargaining agreement that memorializes negotiated terms and  
26 conditions of employment, benefits, rules, a grievance procedure and other procedures of the  
27 workplace. The agreement has been in place since 2019 and renews automatically on an annual

1 basis, unless either party requests to bargain a new agreement.

2       45. AFSCME Local 3870 represents a collective bargaining unit of approximately 126  
3 USDA, Rural Development employees. Specifically, Local 3870 represents employees at the Rural  
4 Utilities Service (RUS) and the Rural Business Cooperative Service (RBCS). At RCBS, Local  
5 3870 represents all professional and nonprofessional employees in the Washington, D.C.  
6 Metropolitan area.

7       46. The mission of RUS is to provide loans and grants to water and waste, telephone,  
8 and electric companies in rural America to improve the services offered to those communities. The  
9 mission of RBCS is to provide loans and grants to businesses in rural America. Bargaining unit  
10 employees include Financial & Business Loan Specialists and Management Analysts, Business  
11 Loan and Grant Technicians, Management Assistants, Environmental Protection Specialists,  
12 General Field Representatives, Sociologists, Loan Technicians, General Field Representatives,  
13 and others.

14       47. AFSCME Local 3870 represents the interests of the USDA's RD employees. Its  
15 core functions include providing support, guidance, and resources to bargaining unit employees as  
16 their officially recognized exclusive representative. As the exclusive representative for the  
17 nonsupervisory Foreign Agricultural Service civil servants, AFSCME Local 3870 enters into  
18 collective bargaining negotiations with the USDA, RD on a wide variety of terms and conditions  
19 of employment and represents bargaining unit members through the negotiated grievance process.  
20 AFSCME Local 3870 and the USDA, RD are parties to a collective bargaining agreement that  
21 memorializes negotiated terms and conditions of employment, benefits, rules, a grievance  
22 procedure and other procedures of the workplace. The agreement has been in place since 2019 and  
23 renews automatically on an annual basis, unless either party requests to bargain a new agreement.

24       48. AFSCME Local 3925 represents a collective bargaining unit of approximately 65  
25 USDA, Farm Production and Conservation Business Center, (FPCBC) Farm Service Agency  
26 (FSA), and Risk Management Agency (RMA) employees. Local 3925 represents all professional  
27 and nonprofessional employees employed by the USDA's, FPCBC, FSA, and RMA in the

1 Washington, D.C. metropolitan area.

2 49. AFSCME Local 3925 represents the interests of the USDA's FPCBC, FSA, and  
3 RMA employees. Its core functions include providing support, guidance, and resources to  
4 bargaining unit employees as their officially recognized exclusive representative. As the exclusive  
5 representative for the nonsupervisory civil servants, AFSCME Local 3925 enters into collective  
6 bargaining negotiations with the USDA on a wide variety of terms and conditions of employment  
7 and represents bargaining unit members through the negotiated grievance process. AFSCME Local  
8 3925 and the USDA, RD are parties to a collective bargaining agreement that memorializes  
9 negotiated terms and conditions of employment, benefits, rules, a grievance procedure and other  
10 procedures of the workplace. The current agreement is effective for a term of four years and expires  
11 on September 16, 2028.

12 **AFSCME Members at AmeriCorps and Peace Corps**

13 50. AFSCME Local 2027 represents a collective bargaining unit of approximately 429  
14 AmeriCorps employees. The collective bargaining agreement covering these workers is  
15 applicable, by its terms, to "all non-professional employees including part-time and intermittent  
16 employees." Bargaining unit members work and live all over the country, including in California,  
17 Texas, Alaska, Colorado, Mississippi, Georgia, Ohio, Delaware, among other states and Puerto  
18 Rico. These employees include Grant Management Specialists, Logistics Assistants, Data and  
19 Analytics Officers, Portfolio Managers, Training Specialists, and others. Many of Local 2027's  
20 bargaining unit members are Portfolio Managers who are out in the field managing and providing  
21 oversight to AmeriCorps programs. Others enable the work of AmeriCorps grantees within their  
22 organizations.

23 51. AFSCME Local 2027 represents the interests of the AmeriCorps employees. Its  
24 core functions include providing support, guidance, and resources to bargaining unit employees as  
25 their officially recognized exclusive representative. As the exclusive representative for the  
26 nonsupervisory AmeriCorps employees, AFSCME Local 2027 enters into collective bargaining  
27 negotiations with AmeriCorps on a wide variety of terms and conditions of employment and

1 represents bargaining unit members through the negotiated grievance process. AFSCME Local  
2 2027 and AmeriCorps are parties to a collective bargaining agreement that memorializes  
3 negotiated terms and conditions of employment, benefits, rules, a grievance procedure and other  
4 procedures of the workplace. The current agreement is effective for a term of five years and expires  
5 on January 17, 2030.

6 52. AFSCME Local 3548 represents a bargaining unit of 322 Peace Corps employees.  
7 The Peace Corps mission is to promote world peace and friendship through community-based  
8 development and intercultural understanding. Generally, AFSCME Local 3548 members work in  
9 roles that support our mission to send volunteers abroad, such as recruitment, placement, training,  
10 administrative support. These employees include Recruiters, Program Support Assistants,  
11 Management and Program Analysts, IT Specialists, Volunteer Placement and Assessment  
12 Specialists, Financial Management Specialists, Public Health Program Specialists, Data Analysts,  
13 Public Health Analysts, and many more. AFSCME Local 3548 bargaining unit members are  
14 stationed all over the U.S. in support of the Peace Corps mission of world peace.

15 53. AFSCME Local 3548 represents the interests of Peace Corps employees. The  
16 local's core functions include providing support, guidance, and resources to bargaining unit  
17 employees as their officially recognized exclusive representative. As the exclusive representative  
18 for Peace Corps employees, AFSCME Local 3548 enters into collective bargaining negotiations  
19 with the Peace Corps on a wide variety of terms and conditions of employment and represents  
20 bargaining unit members through the negotiated grievance process. AFSCME Local 3548 and the  
21 Peace Corps are parties to a collective bargaining agreement that memorializes negotiated terms  
22 and conditions of employment, benefits, rules, a grievance procedure and other procedures of the  
23 workplace. This agreement has been effective since the 1990s and renews on an annual basis,  
24 unless either party requests to bargain a new agreement.

#### 25 **AFSCME Members at U.S. Agency for Global Media**

26 54. AFSCME Local 1418 represents a collective bargaining unit of approximately 24  
27 employees who work for U.S. Agency for Global Media USAGM, specifically at its "Voice of  
28 Declaration of Kory Blake  
Case No. 3:25-cv-03070-JD

1 America" (VOA) media outlet. The collective bargaining agreement covering these workers is  
2 applicable, by its terms, to "all non-supervisory Radio Broadcast Technicians employed by  
3 USAGM in the Radio Master Control" and "Radio Studios" in Washington, D.C., as well as those  
4 "assigned to the New York News Bureau" in New York City, NY. Currently, all members of the  
5 bargaining unit work in Washington, D.C. Some bargaining unit members have been in the past,  
6 and may also be periodically in the future pursuant to the collective bargaining agreement, assigned  
7 to the New York News Bureau, which mainly covers the United Nations, when the bureau there  
8 produces radio programing or audio support for television.

9 55. Under the collective bargaining agreement, AFSCME Local 1418 represents two  
10 types of employees: Radio Broadcast Technicians (RBT) who work in Radio Studios and RBTs  
11 who work in the Radio Master Control. These employees are generally responsible for being  
12 present at each language service live broadcast studio at the time the language service is producing  
13 a live show and engineering the live show for broadcast. These employees are responsible for  
14 engineering live broadcasts of radio programing by running the mixing console in the Radio  
15 Studios or working in the Radio Master Control. Most of the bargaining unit members work in the  
16 Radio Studios. VOA broadcasts approximately 49 live radio programs in different languages that  
17 these employees must engineer to be broadcast. Some of these programs also have video  
18 components that are setting up and running equipment for the radio broadcasts such as computer  
19 programs, audio and video files, microphones, lights, and cameras for programs with video  
20 components. Working under the direction of bilingual directors and producers who understand the  
21 language of the programing and can communicate in English with the RBTs, these employees  
22 operate the broadcast mechanics of live radio programs. RBTs are essential employees that are  
23 vital to maintaining uninterrupted broadcasting operations for VOA. For example, these employees  
24 are in the building 24 hours during snow emergencies, continued working during the entire  
25 pandemic, and must work during government shutdowns as essential staff.

26 56. AFSCME Local 1418 represents the interests of the VOA's Radio Broadcast  
27 Technicians. Its core functions include providing support, guidance, and resources to bargaining  
28

1 unit employees as their officially recognized exclusive representative. As the exclusive  
2 representative for the nonsupervisory RBTs, AFSCME Local 1418 enters into collective  
3 bargaining negotiations with the USAGM, VOA on a wide variety of terms and conditions of  
4 employment and represents bargaining unit members through the negotiated grievance process.  
5 AFSCME Local 1418 and the USAGM, VOA are parties to a collective bargaining agreement that  
6 memorializes negotiated terms and conditions of employment, benefits, rules, a grievance  
7 procedure and other procedures of the workplace.

8 I declare under penalty of perjury under the laws of the United States that the foregoing is  
9 true and correct.

10 Executed this 3rd day of April 2025 in Washington, DC.



11  
12  
13 Kory Blake  
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